

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALLAN CHIOCCA,)	
Plaintiff,)	
)	
VS.)	C.A. NO. 1:19-cv-10482-WGY
)	
TOWN OF ROCKLAND, DEIRDRE)	
HALL, EDWARD KIMBALL, LARRY)	
RYAN, MICHAEL MULLEN, JR.,)	
MICHAEL O'LOUGHLIN, RICHARD)	
PENNY and KARA NYMAN,)	
Defendants)	

DEFENDANT DEIRDRE HALL'S TO MOTION TO IMPOUND

Pursuant to Fed. R. Civ. P. 5.2 and D. Mass. Local Rules 7.2(a) and 83.6.11(b)(4), Defendant Deirdre Hall, hereby moves to redact portions of her memorandum of law in support of her motion for summary judgment, as well as portions of Exhibits attached to Defendant Hall's Memorandum of Law in Support of her Motion for Summary Judgment which relate to her medical conditions, diagnoses, prescriptions, and records, as well as a prior trauma. This motion is set to be filed on Monday, November 15, 2021.

Good cause exists to grant this motion. The motion to impound is premised upon Defendant Hall's medical information, which the Court has already ruled could be sealed in a prior pleading. (Doc. 96). Defendant Hall does not anticipate redacting a large portion of her memorandum of law, but rather, it will be limited to multiple lines within a footnote and deposition transcripts. As such, Defendant Hall seeks to redact the information presented in her memorandum of law and Exhibits to protect her privacy. The parties have entered into a Stipulation and Protective Order agreeing that "all documents relating to counseling, psychiatric treatment or other medical treatment sought by any of the parties and all data obtained from said documents be

confidential.” (Doc. 93). Additionally, D. Mass. Local Rule 83.6.11(b)(4) provides that the Court may protect and file under seal “[a]ny matters of a highly personal or private nature.”

Pursuant to Local Rule 7.2(a), Defendant Hall requests that the material be impounded until further order of the Court.

The undersigned has conferred with all counsel for all parties, and each party has indicated that they have no objection to this motion be granted.

WHEREFORE, Defendant Hall respectfully requests that the Court grant her Motion to Impound.

Dated: November 12, 2021

DEFENDANT,
DEIRDRE HALL,

By /s/ Cindy M. Cieslak
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CERTIFICATION

This is to certify that on this 12th day of November 2021, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

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/s/ Cindy M. Cieslak

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